

Our comments on key issues are below, followed by chapter and page-specific remarks.

Adaptive Management

The final Plan should explicitly address adaptive management and collaboration with State agencies, local communities, and other Alaska stakeholders in Chapter 1, Chapter 4, as well as in the introduction and content of the other chapters, as appropriate.

Coordinated Recreation Infrastructure

The State urges the FS to maintain the flexibility in the plan prescriptions to accommodate uplands areas for some future recreation developments, such as lodges or hardened campsites, as opposed to forcing those developments to occur on less appropriate State tidelands locations where overall ecosystem and visual impacts could be greater. The plan should clarify that; while there are two locations specified for possible future lodge development (Port Wells and Glacier Is.), this may be an allowed use under other prescriptions.

Utility of the Final Plan

The Forest Plan should be a stand-alone document to the maximum extent possible for ease of understanding, and since this is the document that will be used by most everyone in the future rather than the EIS. Relevant portions of the EIS (and other documents) should be incorporated in the Forest Plan. Numerous times other documents are referenced in the plan text but it has been difficult to locate the references. It would be much simpler if the relevant sections were either included as an appendix to the Forest Plan or are summarized and included directly in the text.

The description of the Preferred Alternative needs to be part of the Plan itself, not an appendix. The relationship of the plan map to the Description of the Preferred Alternative in Appendix A is a critical linkage that needs to be established and clearly stated in the text. A significant problem throughout the National Forest planning process has been the inability to understand the intended management direction for a particular area (polygons in map) since all prescriptions are meant to apply uniformly in all areas. These prescriptions, in many cases, only make sense when their application to a particular area is described.

Recreation User Conflicts Near the Road System on the Kenai Peninsula

The State recognizes the extensive efforts of the FS to resolve difficult motorized/non-motorized recreational user conflicts through innovative approaches such as "timeshare" between snow machines and non-motorized recreation. In order to continue to

adequately respond to community needs and concerns, the State believes more work is necessary, and additional options explored, to craft acceptable solutions at Lost Lake and the Twentymile River areas. Additional processes over time may be necessary to craft durable solutions to these challenges.

Brown Bear Habitat

Brown bears represent a significant component of the Kenai Peninsula ecosystem and are enjoyed by residents and visitors alike. DFG, recognizing this importance, has cooperated with the public and other management agencies in the identification and protection of limited important habitat resources essential for the Kenai brown bear population.

Recent research by DFG has increased our understanding of what represents important habitat, however many unanswered questions remain. The FS should remain vigilant in the protection of the important habitat areas already identified, and work cooperatively with DFG to fund and coordinate future research efforts for the development of a dynamic conservation strategy for the Kenai Peninsula brown bear.

The FS should incorporate adaptive management into all components of the Plan that impact brown bears. This adaptive management should not be limited to just the feedback from proposed monitoring (page 4-1, line 10 of the Plan). Much new information on bears in general and on Kenai brown bears in particular, will be released in the next 12-24 months. The Service should ensure that those additional data are incorporated into the management strategies.

Brown Bear Issues: Proposed Revised Land and Resource Management Plan

The State urges the FS to program more than the indicated \$18,000 a year to gather information on brown bear population trends. The Plan identifies several locations on the forest as brown bear core areas. It is not clear how these areas were identified. The brown bear has been identified as a management indicator species (MIS; DEIS page 3-188; table 3-45), however the FS does not present any reasonable way to monitor this species. The methods for monitoring brown bears (page 4-8, table 4-1) are inadequate due to the fact that "*harvest statistics*" do not provide a reliable data source, given the sporadic hunting seasons for Kenai brown bears. The FS must collaborate with DFG to integrate new information and research techniques, monitor the success or failure of management actions, and adjust the Plan accordingly, on an ongoing basis, in an integrated adaptive management framework. Additionally, it is not clear what "bear mortality data" are or how the data will be acquired. Finally, "population surveys" are

often cost prohibitive, and the Plan does not specify when or by whom these will be conducted.

The Plan (pp 3-55; lines 1236-1252) allows for vegetation management, which presumably is synonymous with logging. It even allows that "Created openings in the forest cover may be present" (pp 3-55; line 1246), which implies clearcuts, and the wording clearly opens the door for salvage harvesting (pp 3-56; line 1284). Regardless of the intent of the logging or vegetation management, any roads left open afterwards will increase the risk to bears. The FS must collaborate with DFG to monitor the success or failure of these actions and adjust the Plan accordingly, on an ongoing basis, in an integrated adaptive management framework.

The Plan indicates that guided bear viewing activities will be accommodated (page 3-58; lines 1309-1311). Successful bear viewing frequently entails habituation of bears to people, which could be problematic for a hunted population such as the Kenai brown bear. It is possible that bear viewing activities by humans could push some classes of bears off salmon streams or possibly disrupt the normal bear-bear behavior exhibited while feeding for salmon. The FS must collaborate with DFG to monitor the success or failure of these actions and adjust the Plan accordingly, on an ongoing basis, in an integrated adaptive management framework.

Brown Bear Issues: Draft Environmental Impact Statement (DEIS)

The DEIS indicates that scientific input was sought while developing alternatives (pp. 2-13; lines 412-427). The FS should cite the input and information used to determine that the population of brown bears is currently healthy and stable.

The DEIS identifies late summer as an important time for bears along salmon streams (page 3-192; line 4348), and forestwide guidelines were developed to help protect bears along streams (DEIS, page 3-212; line 5031-5050). The current buffer width of 750 feet is very narrow and likely does not reflect the actual use of habitat by Kenai brown bears, as recently determined by DFG research. We recognize that this information was not available to the Service until recently, which is why it is imperative that new data be immediately incorporated into the Plan. The Service must ensure that new information on streamside use by bears is incorporated into the Plan as soon as the data are made available.

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Subsistence

Please cite subsistence data sources used in the Affected Environment section of the text, particularly any non-Forest Service sources. The "ADF&G Profile Database" is referenced in the Direct and Indirect Effects section. Please clarify how the data was used.

Instream Flows

The State recommends that the FS adopt a policy of comprehensive protection of instream flows in all fresh and estuarine waters of Chugach National Forest. Sufficient water of good quality is among the most essential requirement for insuring protection of sustainable fish and wildlife populations. Base levels of instream flow protection serve to avoid potential water use conflicts from population growth, resource development, and cumulative impacts from multiple withdrawal sources. Reservation of water for instream flow protection can be acquired through the Alaska Water Use Act (AS 46.15).

Apparent Lack of Prescriptive Riparian Standards and Guidelines

Given that non-chargeable commercial timber harvesting totaling 1.51 MMBF from 375 acres¹ is allowed under 9 of the 23 Management Area Prescriptions for the Proposed Revised Forest Plan², we were surprised that no prescriptive riparian protection measures were included in either the Forestwide or Management Area Prescription standards and guidelines. In addition to the harvest volume allowed or anticipated under the Preferred Alternative, between 700 MBF and 19.01 MMBF of timber harvesting is allowed or scheduled to occur under the balance of the alternatives.

However, other than Goal 3 under the Forestwide Ecological Sustainability Goals and Objectives³, no specific prescriptive riparian standards are provided for protecting the biological function and integrity of aquatic systems on the forest, particularly fish-bearing lakes and Class I, II, and III streams. Specifically, Goal 3 states "*Maintain riparian areas in desired conditions for fish, other aquatic life, and riparian dependent species and to provide for the maintenance of ecosystem processes, including important aquatic and land interactions and high quality water related recreation.*" However, without uniform prescriptive standards, it is difficult to determine how the Forest Service proposes to consistently achieve this goal.

1. DEIS, Tables 2-7 and 2-8.

2. Proposed Revised Forest Plan (Chapter 3), Management Area Prescription Activities Tables.

3. Proposed Revised Forest Plan, page 2-3.

For example, none of the Forestwide standards specifically relate to the protection of riparian areas. The only mitigation pertaining to riparian areas is in the form of a guideline which, according to the Proposed Revised Forest Plan (page 2-7), is an advisable course of action that may be followed to achieve forest goals but is optional. That guideline is Soils Guideline 2.a. which states "*Minimize stream bank disturbance within 25 feet of Class I, II, or III streams.*" Consequently, it appears that no provisions have been made for ensuring that a long-term source of large woody debris, detritus (litter input), and shade is maintained along all estuaries, lakes, and Class I, II, and III streams on and adjacent to the forest.

The only mention of specific riparian protection standards occurs on page 3-30 of the DEIS, which states "*To date, riparian areas on the Forest have not been mapped or specifically defined. Under the State of Alaska's Forest Practices Act, the Forest provides for riparian protection zones up to 100 feet wide along streams and lakes. These riparian buffers are intended to protect stream water quality (primarily sedimentation) from adverse effects of timber harvest.*" Does this imply that the riparian standards for state lands will be those that will be used on the Chugach? If this is the case, then it should be reflected in the Forestwide standards to ensure that these measures are implemented consistently across those areas of the Forest where timber harvesting is proposed.

In addition to the State Riparian Standards set out in AS 41.17.118(a)(2)(A) & (B), the Slope Stability Standards of the State Forest Practices Regulations (11 AAC 95.280) must apply as well. These include the following:

11 AAC 95.280(b) – "On all state lands and on all other public lands, the slope stability standards in this section apply to the following area:

- (1) in Region I [the coastal spruce/hemlock forest], within 100 feet of an ordinary high water mark of an anadromous or high value resident fish water body, or a water body with a gradient of 12 percent or less that is tributary to an anadromous or high value resident fish water body, and within 50 feet of all other tributaries to anadromous and high value resident fish water bodies;*
- (2) in Regions II [boreal forest south of the Alaska Range] and III [boreal forest north of the Alaska Range], within 100 feet of an ordinary high water mark of an anadromous or high value resident fish water body."*

The specific slope stability standards for these areas include the following:

11 AAC 95.280(d) – “An operator shall adhere to the following standards when conducting timber harvest activity in an area identified in (a) and (b) of this section:

- (1) avoid constructing a road that will undercut the toe of a slope that has a high risk of slope failure;*
- (2) within the riparian area of streams not subject to AS 41.17.116(a)(3)(B) or 41.17.116(a)(4)(B) [which apply only to private land within the coastal spruce/hemlock forest], in the operator's discretion, leave low-value timber where prudent;*
- (3) achieve full or partial suspension in yarding operations;*
- (4) fall timber away from streams in V-notches;*
- (5) avoid sidecasting of displaced soil from road construction to the maximum extent feasible.”*

Taken together, these two sets of standards form the primary protection measures for riparian areas on state lands and all other public lands⁴ that are subject to timber harvest activities. However, these standards are much less restrictive than those that were developed for the 1997 Tongass Land Management Plan (TLMP) Revision, which included new protections for Class III non-fish-bearing headwater streams, as well as new channel type process group-specific buffers for Class I and II streams.

The impetus for the increased riparian protection afforded by the TLMP Revision was the 1995 Forest Service Region 10 Anadromous Fish Habitat Assessment (AFHA), a report to the U.S. Congress summarizing the effectiveness of current (pre-TLMP Revision) procedures for protecting fish habitat on the Tongass. The AFHA report (page 7) concluded that *“Current practices on the Tongass do not meet either the goal of the Tongass Land Management Plan to ‘preserve the biological productivity of every fish stream on the Tongass,’ or the long-term goal of avoiding the possible need for listing of salmon and steelhead stocks under the Endangered Species Act.”* One of the chief findings that resulted in this conclusion was that *“Perennial non-fish-bearing streams (Class III streams important for water quality) were not given enough protection to fully control sedimentation and prevent probable long-term degradation of fish habitat in downstream waters in all watersheds examined”* (AFHA, Page 8).

4. “other public land” means state land managed by state agencies other than the Department of Natural Resources, land owned by a municipality, and land owned by the University of Alaska.

Consequently, even though the historic and projected future levels of timber harvesting on the Chugach are much less than those on the Tongass, the same underlying concern should exist for the protection of Class III streams, especially within the coastal spruce/hemlock forests of Prince William Sound, which has the highest density of such streams on the Forest. In addition, the minimum riparian standards for state lands that the Alaska Forest Practices Act and Regulations require are even less protective than the pre-1997 TLMP Revision standards that were found to be less than adequate in the long-term protection of anadromous fish habitat. Therefore, we recommend that the final Plan include prescriptive riparian standards and guidelines similar to those that were developed for the 1997 TLMP Revision.

Ability to Maintain New and Existing Roads

While the relatively small decadal increase in total open roads for Alternatives B, C, D, E, F, and the Preferred Alternative appear to be manageable in terms of maintenance, the substantially large increase in the miles of roads proposed under the No Action Alternative and Alternatives A and B do not. This is particularly true given the uncertainties involved in obtaining maintenance funds over and beyond the ten-year period during which these roads are anticipated to be constructed. According to the Forest Service Roadless Area Conservation Proposed Rule, the ability of the Forest Service to mitigate the detrimental effects of roads (such as impacts to water quality and fish passage) nationwide is limited by an \$8.4 billion maintenance and reconstruction backlog and current receipts of only about 20 percent of the annual funding needed to maintain the existing road system to current environmental and safety standards. Therefore, unless future funding can be assured to cover the cost of maintenance, a conservative approach should be taken when considering additional miles of road construction on the Forest.

Heli-Skiing

The State is concerned about the potential impacts of increased heli-skiing and heli-biking in important goat and brown bear areas. The State recommends working closely with commercial operators and the DFG to identify access routes and landing sites in the area north of Jack Bay (Units P198, P222) to minimize impacts. For the past few years, DFG and the FS have been working on issues related to helicopter disturbances of mountain goats on the northern Kenai Peninsula and the Girdwood area (GMU's 7 and 14C), as well as on summer helicopter operations for ecotourism activities within this same area. Adding units P107 and P108 near Valdez and P317 near Whittier to the back country summer and winter motorized prescription would also aid in reducing heli-skiing pressure near population centers and away from important goat and bear habitat. We encourage

this type of collaborative effort for identifying access routes and landing sites in Jack Bay and all other areas on the Chugach in order to minimize helicopter disturbance to, and emphasize the protection of, abundant goats and brown bears.

Hunting Opportunities

The popularity of hunting in Prince William Sound is increasing. The areas between Valdez Arm and Unakwik Inlet (RG249 and RG252) and east of Port Bainbridge (RG266) have long been productive mountain goat registration permit hunt areas. The areas are accessed by boat and airplane, and several hunting guides are currently operating in these hunt areas.

In addition, The northern portion of the Martin River valley is popular with bear and goat hunters (hunt area RG220) and trappers, including non-resident guided hunters (FS planning units C087, C096, C109, C143, and C147. The State supports continued hunting and trapping access into these areas.

State Authorities

The final Plan must appropriately acknowledge the state's management authorities, including deference to the state's regulatory process when decisions may affect management of State lands, hunting, fishing, trapping, and wildlife viewing opportunities. If any significant effects on activities associated with use of fish and wildlife are considered, we urge the Service to work cooperatively with the DFG and fully utilize the Boards process prior to unilaterally effecting hunting, fishing, trapping, or other activities.

The final Plan should serve community needs, taking into account State submerged lands, easements, public rights-of-way and access rights of private property owners, and be consistent with Alaska's cultural, recreational, and other values. Traditional forms of access must be allowed/maintained. In addition, the Plan should reflect that Forest Service jurisdiction applies only to the uplands along navigable river corridors. The FS must commit to a collaborative and consultative relationship with the State on these matters of access.

The Plan must recognize DNR's area plans, which include the Copper River Basin Plan, Prince William Sound Area Plan, and the newly adopted Kenai Area Plan. Also, there should be some statement recognizing the need to coordinate in the future over common or overlapping resource issues. Except for one sentence in an Appendix, there is no mention of the area plans, or any other relevant planning efforts.

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State Management of Fish and Wildlife

The Plan should recognize DFG's statutory mandate to manage the fish, game, and aquatic plant resources of the State and acknowledge that this responsibility extends to all lands and waters of the State. We also request the March 16, 1998, Master Memorandum of Understanding (MMOU) between the Service and DFG be added to the list of agreements and memorandums of understanding on page D-8 of the Plan and that a copy be included for reference in the appendix.

In the Plan, many of the 23 management prescriptions allow administrative and permitted motorized access only upon approval of the "responsible line officer". We are concerned this approval process could limit or delay the conduct of DFG activities occurring under various management prescriptions. We therefore request that the final Plan provide for effective access for DFG management purposes.

Specific examples of areas where this might result in impact to State management activities include the headwaters of Clear Creek, the headwaters of the Martin River, and the DFG camp and weir site on the Coghill River. One example is the difficulty we experienced in making changes to the staff support facility originally constructed around 1990 at the Coghill River weir camp under a land use permit. The process was started in 1998 and took over one year, eventually requiring the Regional Forest Supervisor's involvement to resolve.

Some motorized access restrictions under the Preferred Alternative could displace and concentrate motorized use. An example of an areas where this might effect State management activities is use displaced from the Lost Lake area to the Resurrection Trail area, which supports the Kenai Mountains Caribou Herd, a moderate density of moose, and sheep and goats in limited numbers. In comparison, the Lost Lake area has no caribou or sheep and only a low density of moose below timberline.

The effects of management prescriptions on access, wildlife disturbance, and harvest patterns need to be addressed in the drafts final plan and through the adaptive management process as the Plan is implemented. Particular areas meriting further monitoring and discussion, and their associated issues, include:

- GMU 7 (moose management)
- mountain goat registration permit hunt areas RG249, RG252, and RG266 (access)
- RG249, RG220, RG252, and RG266 (goat hunting access)
- FS planning units C087, C096, C109, C143, and

- C147 (bear and goat hunter and trapper access)
- Copper River Northeastern Recommended 501(b) Wilderness Area (motorized access)
- snowmachine use limitations on Juneau and Resurrection trails (access, recreation).

ANILCA Provisions

The plan should clarify that the ANILCA-designated Nellie Juan-College Fjord Wilderness Study Area remains subject to ANILCA Section 1110(a) which requires a specific process for modifying public access prescriptions. Other federal conservation system unit managers (the National Park Service and the US Fish and Wildlife Service) have long recognized that management plans may recommend and seek public input on access management, but actual implementation requires a proposed rule with appropriate justification.

In addition, ANILCA effectively amended both the Wilderness Act and the Wild and Scenic Rivers Act for areas designated to these systems or set aside for study. We request that the FS confirm a continuation of ANILCA management under these two systems to insure uniform management procedures on conservation system units in Alaska.

Chapter-specific comments:

Chapter I.

The relationship between the management statements, plan map prescriptions, and the description of the preferred alternative is not adequately explained. The plan provides general prescriptions that are meant to apply forest-wide and a plan map that identifies where these prescriptions are to be specifically applied in the National Forest. It is difficult to apply these prescriptions uniformly throughout a large diverse National Forest. This limitation could be addressed by including a description of the management emphasis for a specific geographic area. The Forest Plan contains a fairly brief explanation of this in an Appendix that describes the preferred alternative. We recommend that this description be expanded so that it is clear how specific areas within the Forest are to be managed.

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Chapter 2.

Resource Development.

It is unclear in the Plan that the term 'saleable minerals' includes gravel and/or rock extraction. This use should be recognized under the 'Activities Table' portion of the various prescriptions, where appropriate.

Special Uses (Non-Recreation). Standard 2.

Standard 2 does not allow shore ties, shore caches, waterlines, or other shore facilities associated with floating facilities in Category 1, Backcountry, and Backcountry Motorized prescriptions. This listing incorrectly implies that the Forest Plan exerts control over state owned tidelands and shorelands in all category 1 areas and in both prescriptions.

The State DNR Prince William Sound Area Plan allows floating facilities adjacent to areas that are recommended Backcountry and Backcountry Motorized, subject to coastal zone permitting requirements and a state best interest finding. The area plan does not authorize these facilities in category 1 areas (areas within the Wilderness Study Area.) Since essentially all of the tidelands in Prince William Sound adjoin category 1 areas as well as these two prescriptions, the effect of this recommendation could be to preclude all tideland facilities throughout the Sound that require some type of upland connection.

While DNR discourages upland shore ties, usually there are some requirements for shoreland water supply or shore caches. In discussions with Forest Service staff on floating facilities, DNR did not agree to this standard. There are many areas that could be appropriate for tideland facilities in the central and eastern Sound. We strongly recommend that this recommendation only apply to uplands within category 1 areas.

Special Uses (Non-Recreational). Guideline 1.

This standard suggests that the State of Alaska avoid locating floating facilities adjacent to Backcountry areas. DNR opposes this standard as it applies to Backcountry areas, for the reasons noted above. We recommend that the reference to 'Backcountry areas' be deleted in the wording.

Chapter 3.

Management Area Prescriptions

Introduction: Activities Table.

The State recommends that a sentence be added following the 'Activities Table' statement that explains the relationship of the 'Theme' to the 'Activities Table'.

Although a variety of uses are authorized in an 'Activities Table' for the prescriptions, clearly the intent of the Forest Plan is to make decisions on authorized uses relative to the intent of the prescription. This is not directly stated. A statement recognizing the overall impact of authorizations should also be included. Subsequent permitting actions should not only take into account the management intent, but the overall effect of permitting actions. This condition exists for most geographic areas, but especially for sensitive, Category 1 areas. The direct linkage between the intent (theme) and the activities that are subsequently authorized needs to be described.

Backcountry Management Area – Category 2.

The State supports the distinction between backcountry (nonmotorized), backcountry (winter motorized), and backcountry (winter and summer motorized). The creation of three types of Backcountry prescription-- at the request of the public and agencies -- provides a way to allow various types of motorized use while maintaining an overall theme of minimally disturbed natural landscapes.

However, the distinction between Backcountry and a similar prescription, Backcountry Motorized, is not clear and needs to be better described. The only apparent difference is that 'SUP Destination Lodges' is allowed under the 'Activities' table of the latter. This one difference is not sufficient to warrant a separate prescription by itself. Our understanding is that the principal difference is one of allowed intensity of use, but the theme and management statements do not indicate this. A more comprehensive discussion and explanation is required.

The State recommends that the Backcountry prescription 'Use and Occupancy Activities' matrix include 'SUP Destination Lodges' as a conditional use. The added flexibility may be important in order to respond to increased recreation activity in the western sound where intensive recreation growth is anticipated. We also recommend that other water related uses that are likely to be needed in this area be included in the 'Activities' table. For example, boardwalks adjacent to docks, interpretative areas/sites, and waste disposal sites related to boat landings are not identified.

The State also believes it is important to explain the varying intensity of possible authorized uses within areas designated Backcountry. This recommendation is related to our previous comments on the need to relate the theme, management intent, and subsequent permitting actions under the Activities Table for various prescriptions.

The State maintains that it is possible for the 'intensity', or the number and range of uses that could be applied under a prescription, to reasonably vary in different areas of that prescription. This concept of 'intensity' in application should be explained under the Theme section of the Management Area Prescriptions chapter (page 3-1). It should also be reiterated under the Backcountry prescription 'theme' and 'social systems desired condition' sections (page 3-31) since this prescription is used so widely throughout the Forest Plan.

Backcountry Motorized Management Area – Category 2

See previous comments on Backcountry, above. The distinction between Backcountry and Backcountry Motorized needs to be reiterated in this section. A related issue is that of consistency in prescription application. It is not apparent why the Forest Plan recommends Backcountry (winter and summer motorized) in one part of the National Forest and Backcountry Motorized in another part. For example, Backcountry (winter and summer) is used in the Kenai Peninsula, but Backcountry Motorized is used in the Valdez area. If there is no real difference, we recommend the use of the Backcountry (winter and summer), and if there is a difference, this needs to be better explained.

We also recommend that the Forest Plan provide an explanation of the flexibility in the intensity of use associated with this prescription. The theme gives an overall management intent for the prescription, but uses are identified in the Activities Table that could, if authorized extensively in subsequent permitting processes of the Forest Service, undermine the underlying intent of this prescription.

501(b) Recommended Wilderness Management Area

The State believes fish and wildlife should continue to be priority resources in the Copper River area. This is responsive to local community needs and concerns.

Fish, Wildlife, and Recreation Management Area – Category 3

DNR supports the use of this prescription where a number of multiple management objectives need to be accomplished within a given area. There can be difficulty in using and interpreting the intent of this prescription within a specific area, however, unless management intent language is provided that describes the main management objectives and where/how this prescription is to be applied in subunits of an area. For example, there is no discussion on how this prescription is to be applied in large parts of the Peninsula. From our knowledge of the area, it is likely that many of the areas with this prescription are intended for forest restoration, recreation facility development, and protection of brown bear habitat. Without knowing what is intended, though, this is only

a guess. One of the major reasons for preparing a management plan is to have a reasonable idea of what will occur in an area, to provide predictability of management -- for both the management agency and the public. The Forest Plan needs to be revised to provide this level of specificity. This is especially true for multiple use prescriptions where the potential for misunderstanding is likely to be greatest.

Backcountry Groups Management Area.

This prescription is intended to be used for small, site-specific developments and not for use over large areas. We concur with the use of this prescription, but its use seemingly is limited to two development areas in the entire Sound. This very limited application should be stated in the text since a prescription typically receives extensive use.

More importantly, DNR is concerned that the interpretation could be made that upland development in locations other than the two sites will be inconsistent with the National Forest plan. DNR has worked very hard with the Forest Service to develop a management approach to state tideland use that is coordinated with the Forest Plan. There are instances where state tideland authorizations for floating facilities are not appropriate. Development could better occur on the uplands where there may be easier methods for waste disposal, facility development, and screening. The text needs to be clarified to ensure that this prescription does not necessarily preclude similar types of upland development at other sites affected by different prescriptions.

314. Forest Restoration Management – Category 3.

In lines 1603 through 1608 mention is made of how this prescription is to be applied adjacent to road corridors. We recommend that this description also include management of the spruce bark beetle infestation. In addition, we recommend that the text be expanded to include a description of the management intent of this prescription as it applies to the Hope area, where this prescription is used extensively. A statement is needed indicating the intention of the Forest Service to work with that community in the development of forest restoration plans.

341. Developed Recreation/Reduced Noise Management Area – Category 3.

The State supports this prescription and suggest that the FS apply this category to some existing and new campgrounds. Only three campgrounds use this prescription under the preferred plan. Would this not also be appropriate in others? It would seem that this prescription would be appropriate for all new campgrounds since siting and design flexibility still exists.

521 Minerals Management Area – Category 5.

The State appreciates the inclusion of this new prescription since it provides additional clarity regarding the mineral development process. However, it is unclear how this prescription relates to the 'Minerals' component of the Standards and Guidelines for other prescriptions. Reference to this component should be made in each Standards and Guidelines section or language should be included that indicates its applicability under each prescription where mineral development is allowed. It would also help if the relationship between this section and the 'minerals' component under Standards and Guidelines could be clarified. We presume that this prescription is in addition to any standard identified in the Standards and Guidelines section.

Plan Map Comments

Plan Map and Description of the Preferred Alternative.

The relationship of the plan map to the Description of the Preferred Alternative in Appendix A is a critical linkage that needs to be established and clearly stated in the text. A significant problem throughout the National Forest planning process has been the inability to understand the intended management direction for a particular area (polygons in map) since all prescriptions are meant to apply uniformly in all areas. We understand that the Forest Service believes that the lack of specificity in its prescriptions is a significant benefit. However, these prescriptions, in many cases, only make sense when their application to a particular area is described.

The State urges the FS to articulate in the Preferred Alternative what uses are actually intended out of all the allowed uses, in as geographically specific manner as possible. The absence of clarity of management intent is a real problem with multiple use prescriptions, especially the Fish, Wildlife, and Recreation prescription. Recognizing that the Plan Map is directly related to the 'Description of the Preferred Alternative' would resolve, for the public and the agencies, the problem of vagueness in the multiple use prescriptions. Linking these would explain the plan's intent for resource management in a particular area. It is difficult to decipher what the plan intends for an area through an interpretation of just the prescriptions and map alone. We further recommend that the explanations in the 'Description of Preferred Alternative' be expanded, particularly in instances where multiple use prescriptions apply (i.e., FR and FWR) and cover large areas. In the final plan this section should be referred to as 'Description of Forest Plan'.

Interests Emphasized – Resource Production.

The Plan 'emphasizes' road accessible personal use/free forest products, small-scale commercial (non-chargeable) harvest, and special forest products (page A-2). This section needs to be corrected. First, personal use/free forest products may not necessarily be road accessible. Second, the location of small-scale commercial harvest and the relevant prescriptions need to be identified. We understand that such industry is intended specifically for the Forest Restoration and Fish, Wildlife, and Recreation prescription areas on the Kenai Peninsula and in some areas east of Cordova adjacent to highways/roads. This needs to be stated more explicitly. Finally, the term 'special forest products' needs to be defined. Conversations with Forest Service staff indicate that this term refers to vegetation control. If this is intended, it is not readily apparent.

Kenai Peninsula

The State generally supports the recommended designations for this area. We recognize that the Forest Service has worked hard to satisfy all of the competing interests, and the proposed prescriptions accommodate most of our concerns. These include the protection of Brown Bear concentration areas, treatment of beetle infested areas, provision for mineral development, supply of commercial timber to small operators, continuation of current snowmobiling use in many areas, use of the FWR prescription coupled with application of the Scenic Corridor Plan along the Seward Highway, provision of some areas for nonmotorized use, and use of the Recreation River prescription for Six Mile Creek and the Upper Fork of Six Mile Creek.

The State is unclear as to what exactly is intended for the intersection area of the Seward and Sterling Highways, specifically Developed Recreation prescription polygons 341, 441, 147, 148, 151, 153, 157, 161, 163, and 164.

Placer River – Portage – Twenty Mile

The State generally supports the recommended designations within this area, which accommodate continued snowmachining in the existing use areas, and the use of the FWR prescription adjacent to the areas of facility development and intense recreation use in the Portage Valley. In order to continue to adequately respond to community needs and concerns, the State believes more work may be necessary, and additional options explored, to craft acceptable solutions in the Twentymile River area. Additional processes over time may be necessary to craft durable solutions to these challenges.

Prince William Sound

Fishing and seafood processing together are the number one private sector employer in Alaska, and the salmon streams of the Chugach forest are significant fish producers. In the Chugach National Forest the Copper River and its tributaries such as the Martin River, stands out as one of Alaska's premier Salmon rivers. The Copper River Delta is a haven for anglers, hunters, wildlife watchers, and hikers. Determining the best way to afford strong protection to the Copper River area, consistent with the Alaska National Interest Lands Conservation Act, is an important component of the land management planning process.

The State concurs that the primary management orientation of this large area should be recreation and protection of the inherent natural values of this large, unique region. We also concur with the use of flexible prescriptions within those areas of the western Sound expected to be impacted by additional recreation use made possible by the Anderson Tunnel. We are also pleased that areas of high mineral potential are recognized in the text and plan map, providing for the ability to appropriately pursue mining operations.

Variation in Intensity of Use.

The Forest Plan should state in the Description section what variation in use intensity within the Sound is intended, especially within its westernmost area. Our understanding is that small, dispersed developments (page A-4) are intended within a radius (20-30 nm) from Whittier within the Backcountry prescription. Limits on the number, kind, and intensity of (development) authorizations within the Backcountry prescription are also expected, consistent with the theme of this prescription, particularly in the areas of Blackstone and Cochrane Bays, Perry Island, and Culross and Esther Passage. The intensity of authorized uses is believed to be even less beyond the radius and, if this is accurate, it needs to be stated.

Montague Island.

DNR recommends the use of the FWR prescription in western, southwestern, and parts of southern Montague Island. (Polygons 513, 515, 583, 516, 519, 517, 520, and 584). The FWR prescription is more appropriate given that this part of the island has been used for timber harvest and this use may be appropriate in the future. The FWR prescription would retain that possibility.

Valdez – Cordova Area

Sawmill Bay.

The State is concerned with the use of the Backcountry Motorized prescriptions adjacent to Sawmill Bay State Marine Park (specifically polygons 200, 201, 202, and 204). This area should be designated Backcountry Nonmotorized.

Sawmill Bay is a small cirque-type fjord with productive estuaries and very steep hillsides. Both the estuaries and the hillsides are inappropriate for ATV/ORV use from the standpoint of user safety and impact to the environment. The amphitheater configuration currently amplifies noise from helicopters transiting the area. Noise from helicopter landings would be louder and more resonating than normal because of the bay's configuration.

Boswell Bay.

The forest prescription seems to overlap the pending and existing boundaries of the state marine park at this location. This is inappropriate.

Polygons south of P222.

The State is uncertain if this is an active area for snowmobiling, in which case the use of the Backcountry (Winter Motorized) prescription might be appropriate.

Carbon Mountain Road

The State recommends that any prescription immediately adjacent to this state patented road be flexible enough to accommodate highway-related improvements. This could be accomplished through the application of the FWR prescription for this distance along the highway corridor, similar to the management approaches taken on the Seward and Copper River highways.

Other Plan Map Comments

The map legend needs the following revisions

The notation 'Not for Conveyance' needs to be explained; usually this can be accomplished through use of a footnote on the map. Very few people understand what 'conveyance' means and the Plan Map needs to indicate what is meant and whether these are probable areas of conveyance or, simply, all areas of possible conveyance. It would also be helpful to indicate that the conveyances would occur to the state and native corporations.

Certain items in the Legend are not pertinent to the Plan Map. Certain information is irrelevant to a plan map and should be deleted (Anchor Buoy, state mariculture permit, state tideland permit, fish hatchery). These are carryovers from previous background maps and are no longer appropriate for inclusion.

Comments on Appendix A – Description of the Preferred Alternative

The importance of this Description needs to be stressed, as it is an essential tool in understanding the plan and properly administering the National Forest in the future. Because of its importance, this section needs to be part of the Plan itself - not an appendix.

Because of the central importance of the Appendix, our review comments follow. Where we have already stated a position on use of a prescription previously, it is not repeated here:

Kenai Peninsula.

The State understands that, in addition to the areas of Forest Restoration, areas designated FWR containing spruce bark beetle affected areas are also intended to receive treatment, particularly relating to life and safety near communities. The text states that this prescription is to be applied to 'selected sites' along the Seward Highway. We interpret this to mean areas immediately adjacent to the highway. However, there are very large FWR areas situated south of Hope, along the Hope Highway leading into that community, adjoining Cooper and Kenai Lakes, and generally east of the Moose Pass area that do not seem to be 'sites'. If infestation sites within these areas will be similarly managed, this needs to be clarified. It is also our understanding that certain areas designated FWR are intended for recreation development and some are essential to brown bear movement. If this is correct, these clarifications need to be included as well.

The State understands that small-scale commercial (non-chargeable) timber operations would be allowed and are appropriate. The DNR Division of Forestry has consistently mentioned the need for a predictable timber supply program for small operators in the Kenai Peninsula. This program is also appropriate to the Cordova area. The opportunity/appropriateness of such a program should be clearly stated in the text.

The State recommends that the Forest Plan be more explicit concerning the development of adequate use facilities along the Seward Highway and at trailheads. Trailheads and road pullouts are the principal use areas, besides the trails themselves. More planning and infrastructure - in collaboration with State agencies - needs to be provided for these

areas. The importance of this should be emphasized as a policy or goal in Chapter 2. Further refinement of facility location/development should be made in Chapter 3.

Prince William Sound

The text "emphasizes small, dispersed developments to accommodate projected increases in recreation use due to the new Whittier Road. Emphasis on this type of development is placed within a projected 'day' use' zone from Whittier – see map." We recommend that the text state that the prescriptions within this area are intended to accommodate the expected demand. There are a number of these prescriptions, but it is our understanding that development is really intended to occur in areas designated Backcountry. (It probably is not intended in areas designated FWC or Wilderness.) However, we could find no indication of the 'map'. A map should be provided or the day-use boundary noted on the Plan Map.

The text states that "Upland resorts and tideland commercial float facilities are encouraged only in Sheep Bay, Simpson Bay, and the entrance to Port Fidalgo. Management prescriptions will be coordinated with the State of Alaska Area Plan." We are concerned that this statement makes reference to tideland areas, which are owned by the state. Please clarify that this is a recommendation to the State regarding a revision to our area plan. Alternatively, the statement should be dropped altogether.

Comments on Appendix C - Access Management Plan

The appendix does not adequately identify Omnibus roads and RS 2477 Easements. The Plan states that it only identifies National Forest roads and trails.

The plan text does not reference this Appendix. The text typically states that motorized uses are allowed on designated routes and trails, but should state that the referenced routes and trails are those identified in this Appendix, unless 'routes and trails' is a general type of statement and can apply to many different forms/types of routes and trails, not just those identified in the Appendix. This requires clarification.

The final Forest Plan needs to explain the basis for the determination of allowed/not allowed uses on trails and easements. There are many subtle differences between the allowed uses on trails between the various alternatives. For example, regarding the Childs Glacier S trail/easement, in the preferred alternative (as depicted in Table C-2), horses and bicycles are not allowed, but snowmachines and dogsleds are, while in the no action alternative bicycles and horses are allowed but snowmachines and dog sleds are